Message

From: Horne, Michael [michael_horne@fws.gov]

Sent: 1/5/2022 2:18:37 PM

To: Carpenter, Angela [Carpenter.Angela@epa.gov]; Kahan, Scott [scott kahan@fws.gov]

CC: Vaughn, Stephanie [Vaughn.Stephanie@epa.gov]; Kaur, Supinderjit [Kaur.Supinderjit@epa.gov];

kimberly.childe@sol.doi.gov; Flanagan, Sarah [Flanagan.Sarah@epa.gov]; Prince, John [Prince.John@epa.gov];

Fajardo, Juan [Fajardo.Juan@epa.gov]; Taylor, Graham [graham_taylor@fws.gov]; Molnar, George C [george molnar@fws.gov]; Crawford, Amanda L [amanda.crawford@sol.doi.gov]; Crout, Charles M

[charles.crout@sol.doi.gov]

Subject: Re: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical

Memorandum, Rolling Knolls- review requested

Good morning all:

Having not heard any feedback from EPA regarding our report and the link that I shared on 12/16/21, I presume that you were able to download the information successfully. The day of that email, FWS began getting requests for the information from the PRP group and its consultant. As such, it is time to move forward with releasing this information to our remaining partners following a phased approach.

Currently we envision sharing the report with the PRP group, Miele Trust, and our state and local government partners early next week (1/10). The following week (1/17), the plan is to share the report with the Great Swamp Watershed Association, Technical Advisory Group consultant, Community Action Group and other partners. The hope to provide an brief overview of the results in the next (January) CAG meeting and present our complete results to the community thereafter in upcoming CAG meeting (February).

I trust that you will find this plan agreeable and we remain ready at any time to meet with EPA to discuss the report or any other facets of the project.

Mike

From: Horne, Michael <michael_horne@fws.gov> Sent: Thursday, December 16, 2021 8:34 AM

To: Carpenter, Angela <Carpenter.Angela@epa.gov>; Kahan, Scott <scott_kahan@fws.gov>

Cc: Vaughn, Stephanie < Vaughn. Stephanie@epa.gov>; Kaur, Supinderjit < Kaur. Supinderjit@epa.gov>; Childe, Kimberly H < kimberly.childe@sol.doi.gov>; Flanagan, Sarah < Flanagan. Sarah@epa.gov>; Prince, John < prince.john@epa.gov>;

Fajardo, Juan <Fajardo.Juan@epa.gov>; Taylor, Graham <graham_taylor@fws.gov>; Molnar, George C <george_molnar@fws.gov>; Crawford, Amanda L <amanda.crawford@sol.doi.gov>; Crout, Charles M <charles.crout@sol.doi.gov>

Subject: Re: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum, Rolling Knolls- review requested

Good morning Angela,

We are happy to share the results of our investigation from this past spring/summer. You will see that our findings augment the data presented in the Remedial Investigation in a few key areas. These areas include: contamination at depth in the landfill, a better horizontal extent of contamination profile on refuge land, a better understanding of migration pathways under various redox conditions, presence of PFAS, empirical observations of active leaching, and locations of additional drum carcasses. Of particular note is the high concentrations of mercury that appear throughout the entire study area.

In addition, we will be sharing a remedial alternatives evaluation that provides an FS-level review of the consolidation and capping with on site materials option that we have previously discussed. This document is nearing completion and will be shared when available.

We look forward to discussing these results with EPA and suggest a meeting between us prior to our sharing this report with other partners and the CAG. The following link should enable you to download the report in its entirety or the report with appendices removed. Please advise if you are having any difficulties with the link or the download process.

https://fileshare.fws.gov/?linkid=KZi4zr6VWWWvvpMkufuNkZCl0pHgDMEA8YDODS6ncAGbVD1enfnXmw

Absent that, we wish you all a happy holiday season and look forward to fruitful discussions in the coming year.

Mike

From: Carpenter, Angela < Carpenter. Angela@epa.gov>

Sent: Wednesday, December 8, 2021 8:56 AM

To: Kahan, Scott <scott_kahan@fws.gov>

Cc: Vaughn, Stephanie < Vaughn.Stephanie@epa.gov>; Kaur, Supinderjit < Kaur.Supinderjit@epa.gov>; Childe, Kimberly H < kimberly.childe@sol.doi.gov>; Flanagan, Sarah < Flanagan.Sarah@epa.gov>; Prince, John < Prince.John@epa.gov>; Fajardo, Juan < Fajardo.Juan@epa.gov>; Taylor, Graham < graham_taylor@fws.gov>; Horne, Michael < michael horne@fws.gov>

Subject: RE: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum, Rolling Knolls- review requested

Thank you Scott, Happy Holidays to you as well!

Do you know when you think we might see the report on the supplemental investigation report?

Thanks, Angela

From: Kahan, Scott <scott_kahan@fws.gov>
Sent: Wednesday, December 8, 2021 7:45 AM

To: Carpenter, Angela < Carpenter. Angela@epa.gov>

Cc: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; kimberly.childe@sol.doi.gov; Flanagan, Sarah <Flanagan.Sarah@epa.gov>; Prince, John <Prince.John@epa.gov>; Fajardo, Juan <Fajardo.Juan@epa.gov>; Taylor, Graham <graham_taylor@fws.gov>; Horne, Michael <michael_horne@fws.gov>

Subject: Re: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum, Rolling Knolls- review requested

Good morning Angela and Happy Holidays!

I wanted you to know that we have received the draft report on the supplemental investigation. We will be transmitting this to you for your review and we look forward to discussing the results/next steps prior to sharing this same info with the CAG.

Scott Kahan

From: Carpenter, Angela < Carpenter.Angela@epa.gov>

Sent: Monday, January 4, 2021 3:29 PM

To: Kahan, Scott < scott_kahan@fws.gov>; Taylor, Graham < graham_taylor@fws.gov>; Fajardo, Juan

<Fajardo.Juan@epa.gov>

Cc: Vaughn, Stephanie < Vaughn. Stephanie@epa.gov >; Kaur, Supinderjit < Kaur. Supinderjit@epa.gov >; Childe, Kimberly H < kimberly.childe@sol.doi.gov >; Horne, Michael < michael horne@fws.gov >; Flanagan, Sarah < Flanagan. Sarah@epa.gov > Subject: RE: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum, Rolling Knolls- review requested

Good afternoon Scott,

I hope your holiday was enjoyable!

Thank you for your letter, our response including EPA comments on the FS, is attached. Please feel free to contact me if you have any questions. I can be reached at 212 637-4435 or via email.

Respectfully, Angela

Angela Carpenter, Chief Special Projects Branch Superfund and Emergency Management Division

From: Kahan, Scott < scott kahan@fws.gov > Sent: Wednesday, November 25, 2020 10:52 AM

To: Carpenter, Angela < <u>Carpenter.Angela@epa.gov</u>>; Taylor, Graham < <u>graham taylor@fws.gov</u>>; Fajardo, Juan < Fajardo.Juan@epa.gov>

Cc: Vaughn, Stephanie < <u>Vaughn.Stephanie@epa.gov</u>>; Kaur, Supinderjit < <u>Kaur.Supinderjit@epa.gov</u>>; kimberly.childe@sol.doi.gov; Horne, Michael < michael_horne@fws.gov>

Subject: Re: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum, Rolling Knolls- review requested

Dear Angela:

As we discussed during our conference call on November 19, 2020, the U.S. Fish and Wildlife Service (FWS) is continuing to request assistance from the U.S. Environmental Protection Agency (EPA) regarding a supplemental investigation at the Rolling Knolls Landfill Superfund Site in Morris County, New Jersey. As you know, this site is largely surrounded by Great Swamp National Wildlife Refuge and, both surface water and shallow groundwater flow from the site onto the refuge. As the Federal agency responsible for administering the lands and waters of the refuge under Federal law, the FWS wants to work with EPA to ensure that releases of hazardous substances from this landfill are remedied to protect refuge resources for the benefit of present and future generations of Americans.

The FWS has identified data gaps related to the potential for hazardous substances to migrate onto the refuge based on the remedial investigation activities conducted to date. While you and your staff have advised that you believe these data gaps can be addressed after the remedy for the site is selected, the FWS believes additional data are needed to inform that decision and has advised EPA we plan to complete a supplemental

investigation on an expedited schedule to ensure EPA can consider the additional information and move forward with its process as quickly as possible.

I transmitted both our data gap analysis and the quality assurance project plan (QAPP) for the supplemental investigation to you on October 30, 2020. To facilitate our efforts to begin field work this fall, I requested that EPA advise us within 10 business days of any comments it may have on these documents. You advised on November 12, 2020, that EPA would require additional time to review these documents. In our follow up call on November 19, 2020, you advised that EPA had not yet initiated its review and could not project when its review would be completed because of resource constraints. In addition, you advised that if the FWS proceeds with this work without EPA review, EPA may later advise that the data collected are not of adequate quality for EPA to consider or rely upon in determining the appropriate remedy for this site. We understand challenges that come with resource constraints and ask that the EPA proceed with review of the QAPP as quickly as possible and provide a date as to when we can expect comments so we can schedule fieldwork accordingly.

You also advised on November 12, 2020, that EPA would only consider review of the additional data collected by the FWS at a future phase of the project, such as the pre-design investigation, not in selecting the appropriate remedy. During our call on November 19, 2020, we explained that the additional data that the FWS will be collecting are critical to determining the appropriate landfill remedy, specifically, the nature of the cover needed to properly close the landfill. The question of whether the landfill waste can be covered with soil that will allow continued surface water infiltration and potential contaminant migration or should it be covered with clay or some other material that minimizes such infiltration and potential migration is fundamental to evaluating the feasibility of remedial alternatives and should not be deferred to remedial design. We request that EPA not finalize the remedy until you can incorporate our supplemental investigation results.

Finally, you have advised that EPA is completing its comments on the draft feasibility study for the site and expects to transmit them to the private parties preparing the feasibility study in the next few weeks. For more than 2 years, the FWS has been requesting that the feasibility study include an alternative that would consolidate the landfill waste onto the privately owned portion of the site and construct a clay cap over the waste using material sourced onsite. The FWS successfully completed a similar remedy at a smaller disposal area within the refuge as part of the Asbestos Dump Superfund Site. This alternative would remove hazardous substances from the refuge and properly close the landfill to prevent migration of hazardous substances into the shallow groundwater and surface waters of the refuge. We ask that EPA request inclusion of this alternative in its comments on the draft feasibility study or, alternatively, refrain from providing comments on the draft feasibility study until the results of our supplemental investigation can be incorporated.

We value your coordination and cooperation on this important matter and look forward to hearing back from you on our requests. If you have any questions or would like to discuss further, please contact me at 413-253-8551

Sincerely,

Scott Kahan Regional Chief National Wildlife Refuge System From: Carpenter, Angela < Carpenter. Angela@epa.gov >

Sent: Tuesday, November 17, 2020 1:41 PM

To: Taylor, Graham <graham taylor@fws.gov>; Kahan, Scott <scott kahan@fws.gov>; Fajardo, Juan

<Fajardo.Juan@epa.gov>

Cc: Vaughn, Stephanie < <u>Vaughn.Stephanie@epa.gov</u>>; Kaur, Supinderjit < <u>Kaur.Supinderjit@epa.gov</u>>; Childe, Kimberly H < kimberly.childe@sol.doi.gov>; Horne, Michael < michael horne@fws.gov>

Subject: RE: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum, Rolling Knolls- review requested

Thank you!

From: Taylor, Graham < graham taylor@fws.gov>
Sent: Tuesday, November 17, 2020 10:50 AM

To: Kahan, Scott < scott kahan@fws.gov >; Carpenter, Angela < <u>Carpenter.Angela@epa.gov</u> >; Fajardo, Juan

<Fajardo.Juan@epa.gov>

Cc: Vaughn, Stephanie < <u>Vaughn.Stephanie@epa.gov</u>>; Kaur, Supinderjit < <u>Kaur.Supinderjit@epa.gov</u>>; <u>kimberly.childe@sol.doi.gov</u>; Horne, Michael < <u>michael_horne@fws.gov</u>>

Subject: Re: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum, Rolling Knolls- review requested

Good Morning Everyone,

Here is the call-in information for our call on Thursday at 3:00 pm.

Phone: 866-715-0983 Passcode: 2509018

Thanks and we look forward to the call.

Graham

From: Kahan, Scott < scott kahan@fws.gov> Sent: Tuesday, November 17, 2020 9:07 AM

To: Carpenter, Angela Carpenter, Angela Carpenter, Angela Carpenter, Angela Carpenter, Angela@epa.gov>; Fajardo, Juan Fajardo.Juan@epa.gov>

Cc: Vaughn, Stephanie < <u>Vaughn.Stephanie@epa.gov</u>>; Kaur, Supinderjit < <u>Kaur.Supinderjit@epa.gov</u>>; Childe, Kimberly H < <u>kimberly.childe@sol.doi.gov</u>>; Taylor, Graham < <u>graham_taylor@fws.gov</u>>; Horne, Michael < <u>michael_horne@fws.gov</u>>

Subject: Re: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum, Rolling Knolls- review requested

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Hi Angela- Thursday at 3PM works for us. Would you like us to send out a call in number/teams invite?

Looking forward to our call- scott

Scott Kahan Regional Chief, NWRS 413-835-1931

From: Carpenter, Angela < Carpenter. Angela@epa.gov>

Sent: Monday, November 16, 2020 4:42 PM

To: Kahan, Scott <scott kahan@fws.gov>; Fajardo, Juan <Fajardo.Juan@epa.gov>

Cc: Vaughn, Stephanie < Vaughn.Stephanie@epa.gov>; Kaur, Supinderjit < Kaur.Supinderjit@epa.gov>; Childe, Kimberly H < kimberly.childe@sol.doi.gov>; Taylor, Graham < graham taylor@fws.gov>; Horne, Michael < michael horne@fws.gov> **Subject:** RE: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation

Technical Memorandum, Rolling Knolls- review requested

Hi Scott,

We aren't available tomorrow but here are two alternate dates. Not everyone from our team is available but if you need to have this discussion this week then the following are possibilities on our end. Could you let me know if either of the following work for your team:

- Wednesday 11/18 at 4 pm
- Thursday 11/19 at 3 pm

If neither is an option I will look for other possibilities for next week.

Regards, Angela

From: Kahan, Scott <scott kahan@fws.gov> Sent: Sunday, November 15, 2020 1:34 PM

To: Carpenter, Angela < Carpenter. Angela@epa.gov>; Fajardo, Juan < Fajardo. Juan@epa.gov>

Cc: Vaughn, Stephanie < Vaughn. Stephanie@epa.gov>; Kaur, Supinderjit < Kaur. Supinderjit@epa.gov>;

kimberly.childe@sol.doi.gov; Taylor, Graham <graham taylor@fws.gov>; Horne, Michael <michael horne@fws.gov>

Subject: Re: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum, Rolling Knolls- review requested

Thank you for the update you provided, Angela. We would like to schedule a follow-up conference call with EPA Region 2 to discuss the process for moving forward.

We believe the data we are collecting are essential to selecting a remedy that requires proper landfill closure measures to protect the refuge. This additional investigation is intended to address the critical question of potential migration of hazardous substances from the landfill into the refuge through the shallow groundwater. It is a significant commitment on our part and we are working to complete this work as quickly as possible.

Would you be available for a call this Tuesday (Nov. 17) at 10:30 am? scott

From: Carpenter, Angela < Carpenter. Angela@epa.gov>

Sent: Friday, November 6, 2020 10:06 AM

To: Kahan, Scott <scott kahan@fws.gov>; Fajardo, Juan <Fajardo.Juan@epa.gov>

Cc: Vaughn, Stephanie < Vaughn. Stephanie@epa.gov >; Kaur, Supinderjit < Kaur. Supinderjit@epa.gov >; Childe, Kimberly H < kimberly.childe@sol.doi.gov >; Taylor, Graham < graham taylor@fws.gov >; Horne, Michael < michael horne@fws.gov > Subject: [EXTERNAL] RE: Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical

Memorandum, Rolling Knolls- review requested

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Scott,

Thank you for providing an update on the work that the FWS intends to perform on the Refuge portion of the Rolling Knolls Superfund site. We also appreciate your sending EPA the Quality Assurance Project Plan (QAPP) and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum (tech memo) you are utilizing for this work. As we have discussed on several occasions a remedial investigation was conducted for the site, including the portion of the site located on the Refuge. The data from this effort, in combination with the human health and ecological risk assessments, has been used to develop the feasibility study for the site, a draft of which was reviewed by FWS. EPA is in the process of refining comments on the draft feasibility study which we will be providing to the performing potentially responsible parties in the near future.

As you are aware, the QAPP and technical memo are extensive in nature and would need careful and thorough review. Your requested turnaround time of 10 business days would not allow for a proper review. However, EPA will conduct a review of the QAPP and technical memo and will consider use of data generated from the FWS sampling effort based on this review at future phases of the project (e.g., pre-design investigation), as appropriate.

Please let me know if you have any questions, I can also be reached at 212 637-4435.

Angela

From: Kahan, Scott <scott kahan@fws.gov> Sent: Friday, October 30, 2020 1:25 PM

To: Fajardo, Juan < Fajardo. Juan@epa.gov >; Carpenter, Angela < Carpenter. Angela@epa.gov >

Cc: Vaughn, Stephanie < Vaughn. Stephanie@epa.gov >; Kaur, Supinderjit < Kaur. Supinderjit@epa.gov >;

<u>kimberly.childe@sol.doi.gov</u>; Taylor, Graham <<u>graham taylor@fws.gov</u>>; Horne, Michael <<u>michael horne@fws.gov</u>> **Subject:** Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum,

Rolling Knolls- review requested

Dear Juan and Angela,

As you are aware the USFWS contracted for field investigation on the Great Swamp National Wildlife Refuge owned portion of the Rolling Knolls Landfill Superfund Site.

We have completed the first phase of this work. Please find copies of the Quality Assurance Project Plan and Conceptual Site Model and Data Gaps Evaluation Technical Memorandum. The link to the documents is:

https://apint-my.sharepoint.com/:f:/g/personal/jeff_hart_ap-in_com/EuVyqSdhWK1Ommmr4ANnVXwBUFRbqnHqGT5GasTSXBe6Sw?e=NotwX6

We are providing these to you for your early review, and commitment to work cooperatively as we determine the best path forward for site remediation. If you have any comments regarding the above documents, we request they be received no later than 10 business days from today.

We are now moving towards Phase 2 work which calls for additional sampling on the refuge portion of the landfill. The results of USFWS' investigation will ensure that all parties gain a more complete understanding of the impacts of the Site on the Refuge, as well as aid in the selection of an appropriate remedy to address those impacts.

The USFWS looks forward to working with you to ensure that concerns with the Site are addressed and the refuge continues to be an asset to the local community and the National Wildlife Refuge System. If you have any questions or would like to discuss further, please feel free to contact me at 413-835-1931.

Scott Kahan